

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

This document relates to:

*Gaston, et al. v. The Islamic Republic of Iran, No.  
18-cv-12337*

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Fed. R. Civ. P. 15(d) plaintiffs move the Court to allow substitution of the following parties in the above referenced action. The first party being substituted is Beatrice Gaston as Personal Representative of the Estate of Luis Gaston, deceased. She is the sister of the 9/11 decedent, Betsy Martinez, and is substituted for her brother, Luis Gaston, deceased. Luis Gaston, deceased, was the father of the 9/11 decedent and died in 2010. His claim was erroneously filed on behalf of Louis Gaston, instead of on behalf of the Estate of Luis Gaston. His name was misspelled in the Complaint. Beatrice is the personal representative of the Estate of Luis Gaston. The second party being substituted is Frances Gaston, whose name was also misspelled in the Complaint. She is substituted for Francis Gaston.

The following chart demonstrates the how these parties were previously named in the Complaint and how they wish to proceed going forward:

Identification of Party To be Substituted	Reference to Plaintiff in ECF (18-cv-12337)	State of Residence at Filing	Decedent's Name	Paragraph of Complaint Discussing Decedent
Beatrice Gaston as Personal Representative of the Estate of Luis Gaston, deceased	Louis Gaston	New York	Betsy Martinez	ECF No. 1 (18-cv-12337) at Allegation 33 of Appendix 1
Frances Gaston	Francis Gaston	New York	Betsy Martinez	ECF No. 1 (18-cv-12337) at Allegation 31 of Appendix 1

Plaintiffs propose that, upon endorsement of the Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of Court's Office and based on the size of this MDL.

Respectfully submitted,

/s/ Robert Keith Morgan  
Robert Keith Morgan (*pro hac vice*)  
David J. Dickens (*pro hac vice*)  
The Miller Firm, LLC  
108 Railroad Avenue  
Orange, VA 22960  
Tel: 540-672-4224  
Fax: 540-672-3055  
kmorgan@millerfirmllc.com  
ddickens@millerfirmllc.com

Attorneys for Plaintiffs